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18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;
23 ANTHONY MIRANDA, an individual;
24 ERIC HANS, an individual; GARY
25 BRENNAN, an individual; OSCAR A.
26 BARRETTO, JR., an individual;
27 ISABELLE R. BARRETTO, an
28 individual; BARRY BAHRAMI, an
individual; PETE STEPHENSON, an
individual; ANDREW HARMS, an
individual; JOSE FLORES, an
individual; DR. SHELDON HOUGH,
DDS, an individual; SECOND
AMENDMENT FOUNDATION; GUN
OWNERS OF AMERICA; GUN
OWNERS FOUNDATION; GUN
OWNERS OF CALIFORNIA, INC.;
THE LIBERAL GUN CLUB, INC.; and
CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official
capacity as Attorney General of the
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF DR. SHELDON
HOUGH IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

42 U.S.C. §§ 1983 & 1988

Hearing Date: December 4, 2023
Hearing Time: 1:30 p.m.
Courtroom: 9 B
Judge: Hon. Cormac J. Carney

DECLARATION OF DR. SHELDON HOUGH

1. I, Sheldon Hough, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of San Bernardino County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

4. I am a veteran who served four years as a Navy Corpsman (medic) attached to the Marines during the Vietnam war. I graduated from the USC School of Dentistry in 1980. I am the President of the board of Hi-Desert Water District (a special district in the State of California). I have served on that board for 17 years and this is the second 4-year election cycle where I was re-elected unopposed. I am the former President of the Rotary Club of Yucca Valley.

5. I have a valid and current California concealed carry weapon ("CCW") permit issued by the San Bernardino County Sheriff's Department.

6. I legally carry a concealed firearm with me on a daily basis, so that I may be armed and be able to defend myself and potentially others in the event of a life-threatening emergency situation. Prior to SB 2, I only didn't carry my pistol when planning on going to one of the few places where carry was not permitted, such as a school or courthouse.

7. Because SB 2 would prohibit me from carrying in many places where I am accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus my right to be armed for self-defense in public, will be outright eliminated in nearly all common contexts.

8. For example, under SB 2 I cannot carry in any establishment where alcohol is

1 served. My wife and I have been married since 1970 and have made a commitment
2 to never drink. That means I cannot conceal carry at most of the restaurants that I
3 patronize on a regular basis, nor can I even carry in the parking area of such
4 establishments, even though there is absolutely zero risk of me becoming
5 intoxicated while carrying.

6 9. Those two provisions of SB 2 are hardly the only two that will impact me. I
7 can't carry while I stop at a gas station to fill up my car, because most gas stations
8 sell lottery tickets inside, making them off-limits for carry. Under SB 2, carry is
9 also prohibited at urgent care facilities which I have utilized in the past for medical
10 attention and would use in the future. Carry is also prohibited at financial
11 institutions such as my local bank that I frequent, and a variety of other places that I
12 regularly visit.

13 10. I run a dental office in the Yucca Valley and have practiced dentistry since
14 1981. For many years now, I have carried while at work for my own safety and the
15 safety of my staff. SB 2 insultingly took away my right to carry in my own clinic
16 due to its prohibitions on carrying in medical facilities.


17 11. I assume that many of my patients legally carry as well, as many people in
18 San Bernardino County have CCW permits. I have no issue with peaceable people
19 carrying into my dental office. Yet now, under SB 2, if I want to continue to allow
20 people to do so, I must put up a sign on my door affirmatively allowing concealed
21 carry. This forces my business to publicly take a position on a contentious issue,
22 and may needlessly alienate patients who oppose gun rights. Further, I don't want
23 to be a part of legitimizing California's unconstitutional scheme by agreeing to put
24 up such a sign if I want to support the Second Amendment. Americans generally
25 have the right to carry firearms, and shouldn't need to have permission to do so at
26 every private business they visit.

27 12. And, of course, even if such a sign were not required, my patients are also
28 barred from carrying for the same reason I am given SB 2's restrictions on carrying

1 in medical facilities. I oppose both of those provisions, and indeed, all of SB 2's
2 new restrictions on places where carry is no longer allowed.

3 13. These are, of course, just a few examples of how SB 2 affects me, and as I go
4 about my daily life, I am sure to discover several more. SB 2 will essentially
5 destroy my constitutional right to carry, as so few of the places I go to on a daily
6 basis will permit carry, and I don't want to expose my firearm to theft by constantly
7 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would
8 continue to carry in all of these places as I did before the law took effect.

9 I declare under penalty of perjury that the foregoing is true and correct.
10 Executed on September 29, 2023.

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13 
14 Dr. Sheldon Hough, declarant

CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

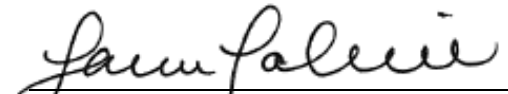
**DECLARATION OF DR. SHELDON HOUGH IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Robert L. Meyerhoff, Deputy Attorney General
California Department of Justice
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Email: Robert.Meyerhoff@doj.ca.gov
Attorney for Defendant

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.



Laura Palmerin